

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

EUNICE & ROBERT MCKINNES

Plaintiffs,

vs.

CIVIL ACTION NO.:

3:06-CV-0041

**AMERICAN INTERNATIONAL GROUP,
INC.; AMERICAN GENERAL
CORPORATION; AMERICAN GENERAL
FINANCE, INC.; AMERICAN GENERAL
FINANCIAL SERVICES OF ALABAMA,
INC.; AMERICAN GENERAL FINANCE
CORPORATION; MERIT LIFE
INSURANCE COMPANY; YOSEMITE
INSURANCE COMPANY; LISA WOOD;
CONNIE FARMER; and Fictitious
Defendants "A", "B", and "C", whether
singular or plural, those other persons,
corporations, firms, or other entities whose
wrongful conduct caused the injuries and
damages to the Plaintiff, all of whose true and
correct names are unknown to Plaintiff at
this time, but will be substituted by
amendment when ascertained,**

Defendants.

**NOTICE OF FILING AFFIDAVIT IN SUPPORT OF
DEFENDANT'S MOTION TO DISMISS**

COMES NOW Defendant American General Corporation, and appearing specially to contest personal jurisdiction, hereby submits the Affidavit of Linda Sanchez in further support of its Motion to Dismiss due to this Court's lack of personal jurisdiction over Defendant American General Corporation.¹

¹ In filing this notice, American General Corporation does not waive and specifically preserves its defense of failure to state a claim upon which relief can be granted, as well as other defenses pursuant to Rule 12 of the Federal Rules of Civil Procedure.

Respectfully submitted,

s/ John Thomas A. Malatesta
Jeffrey M. Grantham (ASB-4866-M66J)
Thomas J. Butler (ASB-7790-T75T)
John Thomas A. Malatesta, III (ASB-4646-O70M)
Attorneys for Defendant American General Corporation

OF COUNSEL:

MAYNARD, COOPER & GALE, P.C.
2400 AmSouth/Harbert Plaza
1901 Sixth Avenue North
Birmingham, Alabama 35203-2618
205-254-1000
205-254-1999 (fax)

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

C. Lance Gould, Esq.
BEASLEY, ALLEN, CROW, METHVIN, PORTIS & MILES, P.C.
272 Commerce Street
Montgomery, AL 36104

David Alan Elliott, Esq.
BURR & FORMAN LLP
SouthTrust Tower, Suite 3100
420 – 20th Street, North
Birmingham, AL 35203

s/ John Thomas A. Malatesta
OF COUNSEL